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November 15, 2006

Jeff S. Jordan, Supervisory Attorney
Complaints Examination & Legal Administration
Federal Election Commission
999 E Street, NW
Washington DC 20463

Re: MUR 5823; Response of Walberg for Congress and Jeffrey Yeutter,
Treasurer ("WFC")

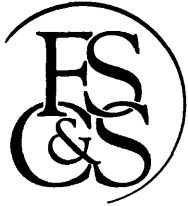
Dear Mr. Jordan:

We have reviewed the complaint (the "Complaint") filed by Mr. Matt Marsden on or about September 25, 2006. Although the Complaint contains numerous allegations, the only allegations directed at WFC concern certain unsubstantiated claims that WFC violated 2 U.S.C. § 434 by failing to report as in-kind contribution the amount expended by Club for Growth, Inc. PAC ("CFG-PAC") as coordinated communications and that WFC violated 2 U.S.C. § 441a(f) by knowingly accepting contributions in excess of \$5,000 from CFG-PAC. Complaint, p. 10. Consequently, WFC will address the Complaint's allegations against WFC, and not as to any other respondent.

In essence, the Complaint alleges that CFG-PAC expenditures on behalf of Tim Walberg were coordinated with WFC "through the use of interconnected vendors, and, thus, were 'coordinated communications' under 11 C.F.R. § 109.21." Complaint, ¶ 29. According to 11 C.F.R. § 109.21(a), in order to trigger the definition of a "coordinated communication", at least one of the conduct standards set forth in 11 C.F.R. § 109.21(d) must be established. Significantly, the Complaint provides absolutely no evidence that any of the conduct standards referenced in 11 C.F.R. § 109.21(d) occurred at all, not to mention due to the actions of WFC, or any agent of WFC. Therefore, for this reason alone, the Complaint must be dismissed.

In contrast to the lack of any evidence whatsoever offered by the Complaint, we have attached affidavits from WFC, Jamestown Associates, and National Research (Jamestown and National being the so-called "interconnected vendors" referenced in Paragraph 29 of the Complaint) that establish that no activity took place between WFC and CFG-PAC, which satisfied one of the conduct standards referenced in 11 C.F.R. § 109.21(d).

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Jeff S. Jordan, Supervisory Attorney
Federal Election Commission
November 15, 2006
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Accordingly, the Complaint must be dismissed. Since not even the Complaint references any activity that satisfies at least one of the conduct standards in 11 C.F.R. § 109.21(d), WFC could not have possibly violated 2 U.S.C. § 434 or 2 U.S.C. § 441a(f).

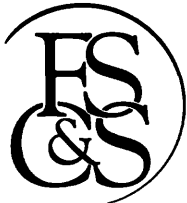
Sincerely,

FOSTER, SWIFT, COLLINS & SMITH, P.C.



Eric E. Doster

EED:dr
Enclosures



27044163885

AFFIDAVIT

Affidavit of Joseph Wicks
Campaign Manager, Walberg for Congress

MUR 5823

STATE OF MI)
COUNTY OF Jackson) ss.

JOSEPH WICKS, being first duly sworn, deposes and says that this Affidavit is made upon personal knowledge of the facts stated herein, and if sworn as a witness, the affiant can testify competently to the following to the best of his knowledge:

1. I am the Campaign Manager for Walberg for Congress ("WFC").
2. As WFC Campaign Manager, I have personal knowledge of all activities or discussions that may or may not have taken place between WFC and Club for Growth, Inc. PAC ("CFG-PAC").
3. I reviewed the Complaint in the above-referenced matter and can unequivocally state that no "coordinated communications" or a commission of a "conduct standard" (as those terms are defined in 11 C.F.R. § 109.21) could have occurred between WFC (which includes the candidate, the authorized committee, or any agent of the foregoing) and CFG-PAC.
4. WFC did not act in cooperation, consultation or concert with CFG-PAC with respect to any CFG-PAC communication.
5. WFC did not request or suggest to CFG-PAC that any CFG-PAC communication be made.
6. No CFG-PAC communication was created, produced, or distributed at the request or suggestion of WFC.

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7. No CFG-PAC communication was created, produced, or distributed at the suggestion of CFG-PAC, whereby WFC assented to the suggestion.
 8. No CFG-PAC communication was created, produced, or distributed with the use of material or information derived from a substantial discussion about the communication with WFC.
 9. WFC did not request or suggest to CFG-PAC that a CFG-PAC communication be created, produced, or distributed.
 10. WFC did not make or authorize a CFG-PAC communication that meets one or more of the content standards set forth in 11 C.F.R. 109.21(c).
 11. WFC did not request or suggest that any other person (including CFG-PAC) create, produce, or distribute any CFG-PAC communication.
 12. WFC was not materially involved in decisions regarding:
 - (i) The content of any CFG-PAC communication;
 - (ii) The intended audience for any CFG-PAC communication;
 - (iii) The means or mode of any CFG-PAC communication;
 - (iv) The specific media outlet used for any CFG-PAC communication;
 - (v) The timing or frequency of any CFG-PAC communication;
 - (vi) The size or prominence of a printed CFG-PAC communication, or duration of a CFG-PAC communication by means of broadcast, cable, or satellite.
 13. WFC did not provide material or information to assist another person (including CFG-PAC) in the creation, production, or distribution of any CFG-PAC communication.
 14. WFC did not make or direct a CFG-PAC communication that is created,

produced, or distributed with the use of material or information derived from a substantial discussion about the communication with a different candidate.

FURTHER, AFFIANT SAYETH NOT.

Dated: November 14, 2006

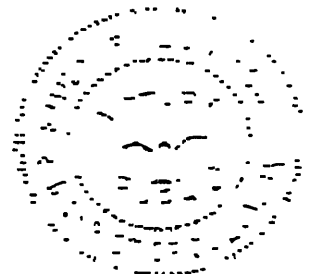
Joseph Wicks
Joseph Wicks

STATE OF MI)
) ss.
COUNTY OF Jackson)

On this 14th day of November, 2006, before me, a notary public in and for said county, personally appeared Joseph Wicks and executed the foregoing instrument and who acknowledged that he executed the same as his free act and deed.

Emily Palumbos
Notary Public
District of Columbia, County, Columbia
My commission expires: 1/09

EMILY PALUMBOS
Notary Public, District of Columbia
My Commission Expires 01/09



27044163389

AFFIDAVIT

Affidavit of Tom Blakely
President, Jamestown Associates

MUR 5823

STATE OF New Jersey)
) ss.
COUNTY OF Mercer)

TOM BLAKELY, being first duly sworn, deposes and says that this Affidavit is made upon personal knowledge of the facts stated herein, and if sworn as a witness, the affiant can testify competently to the following to the best of his knowledge:

1. I am the President of Jamestown Associates ("JA"), which performed various services for Walberg for Congress ("WFC") during the 2006 election cycle.
2. I have personal knowledge of all activities or discussions that may or may not have taken place between JA and Club for Growth, Inc. PAC ("CFG-PAC") with respect to WFC. There were no discussions that took place between JA and CFG-PAC regarding WFC.
3. JA is a completely independent entity from Red Sea, LLC, Basswood Research, and/or National Research, Inc.
4. JA did not act in cooperation, consultation or concert with CFG-PAC with respect to any CFG-PAC communication. For the purposes of this Affidavit, the term "CFG-PAC communication" refers to any CFG-PAC communication relating to Timothy Walberg, a candidate for representative in Congress from the 7th Congressional District of Michigan.
5. JA did not request or suggest to CFG-PAC that any CFG-PAC communication be made.

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6. No CFG-PAC communication was created, produced, or distributed at the request or suggestion of JA.
 7. No CFG-PAC communication was created, produced, or distributed at the suggestion of CFG-PAC, whereby JA assented to the suggestion.
 8. No CFG-PAC communication was created, produced, or distributed with the use of material or information derived from a substantial discussion about the communication with JA.
 9. JA did not request or suggest to CFG-PAC that a CFG-PAC communication be created, produced, or distributed.
 10. JA did not make or authorize a CFG-PAC communication that meets one or more of the content standards set forth in 11 C.F.R. 109.21(c).
 11. JA did not request or suggest that any other person (including CFG-PAC) create, produce, or distribute any CFG-PAC communication.
 12. JA was not materially involved in decisions regarding:
 - (i) The content of any CFG-PAC communication;
 - (ii) The intended audience for any CFG-PAC communication;
 - (iii) The means or mode of any CFG-PAC communication;
 - (iv) The specific media outlet used for any CFG-PAC communication;
 - (v) The timing or frequency of any CFG-PAC communication;
 - (vi) The size or prominence of a printed CFG-PAC communication, or duration of a CFG-PAC communication by means of broadcast, cable, or satellite.
 13. JA did not provide material or information to assist another person (including CFG-PAC) in the creation, production, or distribution of any CFG-PAC communication.
 14. JA did not make or direct a CFG-PAC communication that is created,

produced, or distributed with the use of material or information derived from a substantial discussion about the communication with a different candidate.

15. JA did not perform any services to CFG-PAC within 120 days prior to the time that JA started performing services on behalf of WFC.

16. JA did not use on behalf of CFG-PAC or convey to CFG-PAC:

(i) Specific information about the campaign plans, projects, activities, or needs of Timothy Walberg, Timothy Walberg's opponent, or a political party committee; or

(ii) Specific information used previously by JA in providing services to Timothy Walberg, or WFC, or Mr. Walberg's opponent, or Mr. Walberg's opponent's authorized committee, or a political party committee.

FURTHER, AFFIANT SAYETH NOT.

Dated: November 15, 2006

Tom Blakely
Tom Blakely

STATE OF New Jersey
COUNTY OF Mercer) ss.

On this 15th day of November, 2006, before me, a notary public in and for said county, personally appeared Tom Blakely and executed the foregoing instrument and who acknowledged that he executed the same as his free act and deed.

Edna M. Horan
Princeton, County, Mercer Notary Public
My commission expires: _____

EDNA M. HORAN
A Notary Public Of New Jersey
My Commission Expires July 2, 2007

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AFFIDAVIT

**Affidavit of Adam Geller
President, National Research, Inc.**

MUR 5823

STATE OF _____)
) ss.
COUNTY OF _____)

ADAM GELLER, being first duly sworn, deposes and says that this Affidavit is made upon personal knowledge of the facts stated herein, and if sworn as a witness, the affiant can testify competently to the following to the best of his knowledge:

1. I am the President of National Research, Inc. ("NRI"), which performed various services for Walberg for Congress ("WFC") during the 2006 election cycle.
2. I have personal knowledge of all activities or discussions that may or may not have taken place between NRI and Club for Growth, Inc. PAC ("CFG-PAC") with respect to WFC. There were no discussions that took place between NRI and CFG-PAC regarding WFC.
3. NRI is a completely independent entity and has no relationship to Red Sea, LLC, Basswood Research, and/or Jamestown Associates.
4. NRI did not act in cooperation, consultation or concert with CFG-PAC with respect to any CFG-PAC communication. For the purposes of this Affidavit, the term "CFG-PAC communication" refers to any CFG-PAC communication relating to Timothy Walberg, a candidate for representative in Congress from the 7th Congressional District of Michigan.
5. NRI did not request or suggest to CFG-PAC that any CFG-PAC communication be made.

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6. No CFG-PAC communication was created, produced, or distributed at the request or suggestion of NRI.

7. No CFG-PAC communication was created, produced, or distributed at the suggestion of CFG-PAC, whereby NRI assented to the suggestion.

8. No CFG-PAC communication was created, produced, or distributed with the use of material or information derived from a substantial discussion about the communication with NRI.

9. NRI did not request or suggest to CFG-PAC that a CFG-PAC communication be created, produced, or distributed.

10. NRI did not make or authorize a CFG-PAC communication that meets one or more of the content standards set forth in 11 C.F.R. 109.21(c).

11. NRI did not request or suggest that any other person (including CFG-PAC) create, produce, or distribute any CFG-PAC communication.

12. NRI was not materially involved in decisions regarding:

(i) The content of any CFG-PAC communication;

(ii) The intended audience for any CFG-PAC communication;

(iii) The means or mode of any CFG-PAC communication;

(iv) The specific media outlet used for any CFG-PAC communication;

(v) The timing or frequency of any CFG-PAC communication;

(vi) The size or prominence of a printed CFG-PAC communication, or duration of a CFG-PAC communication by means of broadcast, cable, or satellite.

13. NRI did not provide material or information to assist another person (including CFG-PAC) in the creation, production, or distribution of any CFG-PAC communication.

14. NRI did not make or direct a CFG-PAC communication that is created,

or made of any CFG-PAC communication.

produced, or distributed with the use of material or information derived from a substantial discussion about the communication with a different candidate.

15. NRI did not perform any services to CFG-PAC within 120 days prior to the time that NRI started performing services on behalf of WFC.

16. NRI did not use on behalf of CFG-PAC or convey to CFG-PAC:

(i) Information about the campaign plans, projects, activities, or needs of Timothy Walberg, Timothy Walberg's opponent, or a political party committee; or

(ii) Information used previously by NRI in providing services to Timothy Walberg, or WFC, or Mr. Walberg's opponent, or Mr. Walberg's opponent's authorized committee, or a political party committee.

FURTHER, AFFIANT SAYETH NOT.

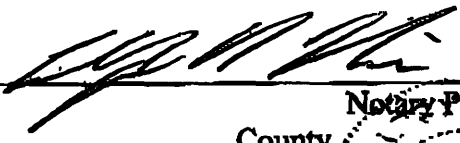
Dated: November 14, 2006


Adam Geller

STATE OF NEW JERSEY)

COUNTY OF MONMOUTH) ss.

On this 14th day of November, 2006, before me, a notary public in and for said county, personally appeared Adam Geller and executed the foregoing instrument and who acknowledged that he executed the same as his free act and deed.


_____, County _____
Notary Public
My commission expires: ANTHONY R. GABRI, ESQ.
NOTARY PUBLIC OF NEW JERSEY
My Commission Expires Dec. 8, 2008